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Filed on behalf of Pro Se  
*LAURI VALJAKKA*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

LAURI VALJAKKA,  
  
Plaintiff,  
  
v.  
  
NETFLIX, INC.,  
  
Defendant.

Case No. 4:22-cv-01490-JST

**REPLY IN SUPPORT OF MOTION TO  
STAY PROCEEDINGS AND DISMISS  
CUVTA CLAIM FOR LACK OF  
TRANSFER AND PROCEDURAL  
DEFECT AND [PROPOSED] ORDER**

Date: December 4, 2025  
Time: 2:00 p.m.  
Crtrm: 6 – 2nd Floor  
Judge: Hon. Jon S. Tigar

## **I. INTRODUCTION**

Plaintiff respectfully submits this Reply in support of his Motion to Stay Proceedings. Netflix's opposition mischaracterizes the Finnish Supreme Court proceeding and overstates authentication demands. The requested stay is narrow, time-limited, and designed to conserve judicial resources while a sovereign court resolves a dispositive ownership issue.

## **II. THE FINNISH SUPREME COURT ORDER IS MATERIAL**

The Finnish Supreme Court has accepted review of ownership of the U.S. application. That proceeding is active and outcome-determinative. Its resolution will directly affect standing and ownership in this litigation. Proceeding here without awaiting that ruling risks inconsistent outcomes.

## **III. RESPONSE TO NETFLIX'S OPPOSITION POINTS**

### **A. Relevance.**

Netflix argues the Finnish proceeding is irrelevant. In fact, it is central: ownership of the U.S. application is under judicial review abroad.

### **B. Delay.**

Netflix claims Plaintiff seeks delay. Plaintiff has already filed Attachments 1–14 documenting the Finnish proceedings. A stay avoids duplicative litigation and waste.

### **C. Authentication.**

Netflix demands full certified translations within seven days. That is impracticable. Plaintiff proposes a reasonable 7/21/35-day schedule, ensuring orderly authentication without prejudice.

### **D. Witnesses.**

Netflix claims witnesses are unavailable. Its own Initial Disclosures (Exhibits A–C) show multiple witnesses remain available. Plaintiff's references were only to highlight selective choices.

### **E. Prejudice.**

Netflix claims prejudice. The proposed stay is conditional, capped at twelve months, and subject to regular status reports. Netflix suffers no prejudice; the Court avoids inconsistent rulings.

#### IV. RELIEF REQUESTED

Plaintiff respectfully requests a conditional stay limited to ownership-related discovery and filings, subject to the simple authentication schedule below.

#### V. SIMPLE AUTHENTICATION SCHEDULE

- **Within 7 days:** Status declaration identifying Finnish document(s) and whether originals are in hand or requested.
- **Within 21 days:** Filing of Finnish source document(s) under seal if available, or proof of registry request.
- **Within 35 days:** Certified English translation of core pages, plus one authenticity declaration.
- **Every 60 days:** Status reports while Finnish matter remains pending.
- **Duration:** Stay not to exceed twelve months absent further order, terminating earlier upon dispositive Finnish ruling.

#### VI. CONCLUSION

The Finnish proceeding is active and material. A short, conditional stay preserves judicial economy, avoids duplication, and respects sovereign processes. Plaintiff respectfully requests entry of the proposed order.

Dated: October 16, 2025

Respectfully submitted,

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LAURI VALJAKKA, Pro Se

**[PROPOSED] ORDER**

Having considered Plaintiff's Motion to Stay, Defendant's Opposition, and Plaintiff's Reply, the Court finds good cause to grant a conditional stay.

IT IS HEREBY ORDERED that:

1. A conditional stay is GRANTED as to ownership-related discovery and filings, subject to the following schedule:
  - Within 7 days: Plaintiff files a status declaration.
  - Within 21 days: Plaintiff files Finnish source document(s) or proof of registry request.
  - Within 35 days: Plaintiff files certified English translation(s) and one authenticity declaration.
  - Plaintiff files status reports every 60 days while the Finnish matter remains pending.
2. The stay shall not exceed twelve months absent further order and shall terminate earlier upon filing of a dispositive Finnish ruling.

IT IS SO ORDERED.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Hon. Jon S. Tigar United States District Judge